

## UNITED STATES DISTRICT COURT

MAR 04 2016

for the  
Western District of VirginiaJULIA C. DUNLEY, CLERK  
BY:  DEPUTY CLERKUnited States of America  
v.

Case No. 7:16MJ31

Brandon Thomas  
Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 3, 2016 in the county of Roanoke in the  
Western District of Virginia, the defendant(s) violated:

## Code Section

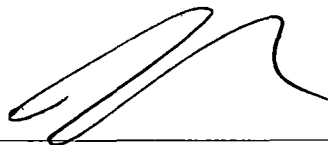
21 USC ~~841~~ - 841b1C  
18 USC 1591

## Offense Description

Controlled Substances  
Sex Trafficking

This criminal complaint is based on these facts:

See Affidavit

☒ Continued on the attached sheet.

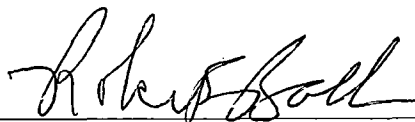
Complainant's signature

Hunter Durham / Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Date: March 4, 2016

City and state:

Roanoke, VA

Judge's signature

Robert S. Bawock, U.S.M.J.  
Printed name and title

**THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF VIRGINIA**

<b>IN THE MATTER OF A CRIMINAL COMPLAINT / ARREST WARRANT FOR:</b>  <b>BRANDON SCOTT THOMAS</b>	<b><u>UNDER SEAL</u></b>  CASE NO. <u>716MJ31</u>
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**AFFIDAVIT IN SUPPORT OF A  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Hunter Durham, being first duly sworn, depose and state the following:

**INTRODUCTION**

1. I make this affidavit in support of a criminal complaint authorizing the issuance of an arrest warrant for Brandon Scott Thomas, a/k/a "Gambino" (hereinafter referred to as "Thomas"); born November 10, 1990, and assigned social security number XXX-XX-5807.
2. I am a Special Agent with the U.S. Department of Homeland Security (DHS), Office of Homeland Security Investigations (HSI), currently assigned to the Office of the Special Agent in Charge in Washington D.C. Prior to my career in federal law enforcement, I served as a member of the United States Military uniformed services for 10 years. I have been awarded academic degrees of Bachelor of Arts and Master of Arts focusing in the field of Political Science. I have been employed as a Special Agent in federal law enforcement since 2006. I am an "investigative or law enforcement officer" as defined in Title 18 of the United States Code, § 2510(7), which grants the authority for such officers to conduct investigations and make arrests for offenses enumerated in Title 18 and other sections of the United States Code.
3. The statements in this affidavit are based on my investigation, experience, training, professional research, information received from other professional sources, and background as a federal agent. I have set forth only the facts I believe are necessary to establish probable cause to believe Brandon Scott Thomas has engaged in violations of Title 18, United States Code, Section 1591(a) and Title 21, United States Code, Section 841(b)(1)(A), which occurred in the Western District of Virginia.
4. Title 18 U.S.C. § 1591(a) governs Sex Trafficking by Force, Fraud, or Coercion, and states, "Whoever knowingly (1) in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, recruits, entices, harbors, transports, provides, obtains, or maintains by any

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means a person; or (2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1), knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion described in subsection (e)(2), or any combination of such means will be used to cause the person to engage in a commercial sex act, . . . shall be punished as provided in subsection (b).

5. Title 21 U.S.C. § 846 governs drug trafficking conspiracies and Title 21 U.S.C. § 841 governs drug trafficking. Section 841 states, "Except as authorized by this subchapter, it shall be unlawful for any person knowingly or intentionally to manufacture, distribute, dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance."

#### CHARACTERISTICS COMMON TO GROOMING IN PROSTITUTION

6. The investigation finds that certain persons acting as pimps are believed to be engaged in the recruitment and sexual exploitation of women for the purpose of inducing them into prostitution service through various means. Your affiant is aware of the following common traits associated with those who facilitate prostitution schemes and engage in the illicit trade of recruiting, grooming, and employing prostitutes within such schemes:
  - A. Grooming is the predatory act of inducing another individual into a position of isolation, dependency, and trust, which increases the person's vulnerability to abusive behavior and control. It focuses on persons already susceptible due to youth or naivety; those seeking emotional or other fulfillment; social disenfranchisement; poor economic conditions; pre-existing behavioral depravity; and other factors;
  - B. the purpose is to gain the target's/victim's trust for the purpose of manipulating the target/victim for the purpose of controlling the victim's behavior. Several intuitive techniques are commonly employed including engaging in relationships and saturation attention; physical flattery; socializing and recruitment through entertainment; physical isolation; gift-giving including offering money earning potential; normalizing questionable sexual behavior; threatening behavior; and other hallmarks;
  - C. facilitators often engage in romantic, spiritual, or sexual relationships with victims, which are often superficial or false with the intended purpose of eliciting the desired trust from the target;
  - D. facilitators commonly introduce victims to illicit drugs in order to induce desire or dependency, which the facilitator can satisfy. Psychological or physical drug dependency is a powerful tool, which facilitators utilize to recruit, groom and control victims.

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- E. facilitators often use superficial relationships for the added purpose of concealing illicit activity or behavior from family, society, or law enforcement. Conditioning of victims to maintain the secrecy of illicit relationships is a highly effective way of concealing activity from disclosure and preventing victims from providing testimony against facilitators. Conditioning often occurs through the process of inducing guilt, shaming and convincing the victim that their actions are of a co-conspiratorial and equally illicit nature;
- F. facilitators use the secrecy of their relationships with victim-individuals in order to engage in similar relationships with other victims thereby enabling their ability to manipulate multiple victims without the other's knowledge. Naivety, isolation, building of superficial trust, and the ability to control the victim are key elements of this ability to manipulate multiple victims; and lastly
- G. facilitators use violence and threats of violence to gain compliance with their demands.

#### PROBABLE CAUSE

#### WITNESS STATEMENTS

- 7. Your affiant has interviewed Witness1, Witness2, Witness3, Witness4, Witness5, and Witness 6, and Victim1, Victim2, and Victim3, among others, regarding the drug and sex trafficking activities of Thomas and his associate Ishi Graves (hereinafter referred to as "Graves").
- 8. Witness2 identified from personal, first-hand knowledge Thomas and Graves as local pimps and dealers of methamphetamine and heroin. Witness2 has stated that over the last several months, Thomas has prostituted multiple women using [www.BackPage.com](http://www.BackPage.com), including Victim2 and Victim3, at local hotels in the Western District of Virginia, including the Days Inn and Ramada Inn in the City of Roanoke. Witness2 stated that the women are drug-dependent and abused by Thomas. Thomas has physically beaten or assaulted women to compel their prostitution activity. In other instances, he has withheld heroin or other drugs while women become drug sick until they perform prostitution activity. Witness2 also has personal knowledge of Thomas purchasing and selling bricks of heroin.
- 9. Witness3 also identified from first-hand, personal experience Thomas and Graves as pimps and drug dealers. The prostitution ads were posted by Thomas and Graves on [www.BackPage.com](http://www.BackPage.com). Witness3 has witnessed Thomas physically abuse and/or threaten the women he was prostituting, in addition to gaining their compliance through chemical dependency.

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10. Witness4 also identified from first-hand personal knowledge Thomas and Graves as pimps and drug dealers of methamphetamine and heroin. Witness4 states that Thomas and Graves use BackPage to run their prostitution business and intentionally recruited drug-dependent or disenfranchised women. Witness4 witnessed Thomas threaten and/or abuse women he was prostituting.
11. Witness5 also identified from first-hand, personal knowledge Thomas and Graves as pimps and drug dealers of heroin.
12. Witness6 also identified Thomas as an abusive pimp and drug dealer.

#### ELECTRONIC EVIDENCE

13. Your affiant obtained records from Google, Sprint and Back Page. The records identify that Brandon Gamzino possessed telephone number (540) 817-0247 from February of 2015 through at least December of 2015. Further, Thomas' estranged wife and others confirmed this phone number belonged to Thomas.
14. Your affiant found at least twenty Back Page advertisements placed on Back Page Roanoke Escorts under Thomas' phone number.
15. An email account, notguilty1990@gmail.com was associated with all of the Back Page ads linked to Thomas' telephone number. The gmail account is registered to Brandon Gambino.

#### VICTIM1

16. During January of 2016, Victim1 stated that Thomas and Graves entered into an arrangement with Victim1 to provide Victim1 with heroin and other controlled substances for the purpose of enticing Victim1 to prostitute at their direction for approximately four days. Thomas and others coerced Victim1 through threats of violence during the arrangement and took control of prostitution proceeds earned by Victim1.

#### VICTIM2

17. Your affiant also met Victim2 on March 3, 2016 at Roanoke Memorial Hospital in Roanoke. According to Victim2, Thomas regularly abuses Victim2 by physically beating her. During the relationship Victim2 has not felt free to leave Thomas and advised that he controls her movement and actions through threats and actual violence. Thomas beats Victim2 frequently and threatens her on a daily basis. Victim2 advised that Thomas has threatened to kill her on many occasions.

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18. Victim2 was present in the hospital because of injuries she suffered on March 2, 2016 during an argument with Thomas. Thomas struck Victim2 repeatedly in the head with his fist, violently restrained Victim2 around her body, and bit her under her right eye. Further, Thomas choked Victim2 around her neck and told her that she was going to "die today." Victim2 had a visible wound at the bite mark. Victim2 also complained of head pain, blurred vision, nausea and was concerned about her pregnancy.
19. Victim2 acknowledged that she worked for Thomas as a prostitute in September 2015 and identified herself as Thomas' girlfriend since January of this year. Victim2 described a time in Charlottesville, Virginia when she performed prostitution activity at Thomas' direction. Thomas posted Victim2's advertisement on Back Page as "Treasure." Victim2 informed your affiant: "I did not want to do it. I turned a couple down and I got in trouble for not having money." Victim2 stated that Thomas yelled at and threatened her.
20. Back Page post 5234 dated September 29, 2015 is a posting for alias "Treasure." The post contains call number (540) 817-0247 and a photograph of Victim2, who is identified by facial photographs. The advertisement was registered for using email account notguilty1990@gmail.com.
21. Victim2 confirmed that Thomas has been recently engaged in similar prostitution arrangements with other women in the Roanoke area.

### VICTIM3

22. Your affiant interviewed Victim3 who identified herself as having prostituted at Thomas' direction in 2015 and 2016 at local hotels in Roanoke and Charlottesville. She stated that Thomas would take all of the money she earned through prostitution services and compelled her prostitution service through chemical dependency and abusive/threatening behavior.

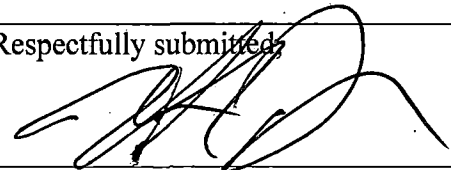
### INTERVIEW OF BRANDON SCOTT THOMAS

23. Brandon Scott Thomas was arrested on March 3, 2016. He was provided his Miranda rights and waived them. In his post-Miranda custodial interview, Thomas admitted the following:
  - A. He is a user of heroin and methamphetamine.
  - B. He has engaged in drug transactions with drug distributors in Roanoke.
  - C. He has engaged in drug transactions with women he identified as prostitutes in Roanoke.
  - D. He has physically abused Victim2.
  - E. He posted an advertisement on BackPage in Charlottesville in the fall of 2015 for the purposes of advertising Victim2's prostitution services.
  - F. The email account notguilty1990@gmail.com belongs to Thomas.

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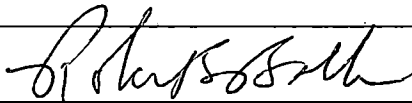
24. Based on the aforementioned factual information, your affiant respectfully submits that there is probable cause to believe that Brandon Scott Thomas has committed violations of Title 18, United States Code, Section 1591, Sex Trafficking by Force, Fraud, or Coercion, and Title 21, United States Code, Section 841(b)(1)(A).

Respectfully submitted,



Hunter R. Durham  
Special Agent  
Homeland Security Investigations  
Roanoke, Virginia

Subscribed and sworn to before me on the 4<sup>th</sup> day of March, 2016.



HONORABLE ROBERT S. BALLOU  
UNITED STATES MAGISTRATE JUDGE